

1 Jeffrey N. Pomerantz (State Bar No. 143717)
2 Teddy M. Kapur (State Bar No. 242486)
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12 Counsel to the Official Committee of Unsecured Creditors

13 **UNITED STATES BANKRUPTCY COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 In re:

16 BORREGO COMMUNITY
17 HEALTH FOUNDATION,

18 Debtor and Debtor in
19 Possession.

20 Case No.: 22-02384-LT11

21 Chapter 11

22 **PACHULSKI STANG ZIEHL & JONES**
23 **LLP'S SECOND MONTHLY FEE**
24 **APPLICATION FOR ALLOWANCE AND**
25 **PAYMENT OF INTERIM COMPENSATION**
26 **AND REIMBURSEMENT OF EXPENSES**
27 **FOR THE PERIOD NOVEMBER 1, 2022 –**
28 **NOVEMBER 30, 2022**

CSD 1143 (04/28/96)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

DEBTOR: Borrego Community Health Foundation

Petition Date: September 12, 2022

Case No: 22-02384

MONTHLY FEE APPLICATION SUMMARY

APPLICANT: Pachulski Stang Ziehl & Jones LLP

REPRESENTING: The Official Committee of Unsecured Creditors

ORDER APPROVING EMPLOYMENT: Docket No. 287

CATEGORY	APPLICATION PERIOD: November 1, 2022 – November 30, 2022	
	HOURS	AMOUNT REQUESTED
Asset Disposition	8.30	\$7,105.50
Bankruptcy Litigation	9.90	\$7,897.50
Case Administration	7.50	\$5,535.00
Claims Admin/Objections	3.30	\$2,605.50
Compensation of Professionals	14.30	\$12,424.50
Employee Benefits/Pension	3.50	\$3,150.00
Financial Filings	0.30	\$270.00
General Creditors Committee	17.90	\$15,259.50
Meeting of Creditors	0.40	\$360.00
Operations	0.50	\$450.00
Retention of Professionals	13.30	\$8,244.00
TOTAL	79.20	\$63,301.50¹

¹PSZJ has agreed with the Committee to seek professional compensation at a blended hourly rate of \$900. The standard hourly rates of the PSZ J professionals designated to represent the Committee are: Jeffrey N. Pomerantz (\$1,445.00 per hour); Debra I. Grassgreen (\$1,425.00 per hour); Teddy M. Kapur (\$975.00 per hour); and Steven W. Golden (\$775.00 per hour).

MONTHLY FEE APPLICATION

Pachulski Stang Ziehl & Jones, LLP (“PSZJ” or the “Firm”) submits its Second Monthly Fee Application for Allowance and Payment of Interim Compensation and Reimbursement of Expenses (the “Application”) for the Period November 1, 2022 – November 30, 2022 (the “Application Period”). In support of the Application, PSZJ respectfully represents as follows:

1. The Firm is counsel to the Official Committee of Unsecured Creditors (the “Committee”). The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

2. The Firm billed a total of \$63,301.50 during the Application Period. The total fees represent 79.20 hours expended during the Application Period. These fees and expenses are broken down as follows:

Application Period	Fees	Expenses	Total
November 1, 2022 – November 30, 2022	\$63,301.50	\$557.32	\$63,858.82

3. Accordingly, the Firm seeks allowance of interim compensation in the total amount of \$51,198.52 at this time. This total is comprised as follows: \$50,641.20 (80% of the fees totaling \$63,301.50 for services rendered), plus \$557.32 (100% of the expenses incurred).

4. As the Firm is filing this Application concurrently with its first monthly fee application covering the period September 30, 2022 – October 31, 2022, no amounts have previously been paid to the Firm.

5. Attached as **Exhibit “1”** hereto is the name of each professional who performed services in connection with this case (the “Case”) during the Application Period and the hourly rate for each such professional. Attached hereto as **Exhibit “2”** is the detailed time and expense statements for the Application Period.

6. The Firm has served a copy of this Application on the United States

1 Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel to the Patient
2 Care Ombudsman, the United States of America, and the State of California, and
3 parties requesting special notice (collectively, the “Notice Parties”). The Application
4 was mailed by first class mail, postage prepaid, on or about December 27, 2022.
5 Notice of the filing of this Application was served on the Notice Parties by first class
6 mail, postage prepaid, on or about December 27, 2022.

7 7. Pursuant to this Court’s *Order on Debtor’s Motion for Entry of an Order*
8 *Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement*
9 (the “Interim Compensation Procedures Order”) that was entered on or about
10 December 15, 2022 [Docket No. 299], the Debtor is authorized to make the payment
11 requested herein with a further hearing or order of this Court unless an objection to
12 this Application is filed with the Court and served upon the Notice Parties within ten
13 (10) calendar days after the date of mailing of the Notice of this Application. If such
14 an objection is filed, the Debtor is authorized to pay 80% of the uncontested fees and
15 100% of the uncontested expenses without further order of the Court. If no objection
16 is filed, the Debtor is authorized to pay 80% of all fees requested in the Application
17 and 100% of the uncontested expenses without further order of the Court.

18 8. The interim compensation and reimbursement of expenses sought in this
19 Application is not final. Upon the conclusion of this Case, the Firm will seek fees and
20 reimbursement of the expenses incurred for the totality of the services rendered in this
21 Case. Any interim fees or reimbursement of expenses approved by this Court and
22 received by the Firm will be credited against such final fees and expenses as may be
23 allowed by this Court.

1 **WHEREFORE**, the Firm respectfully requests that the Debtor pay
2
3 compensation to the Firm as requested herein pursuant to an in accordance with the
4 terms of the Interim Compensation Procedures Order.

5 Dated: December 27, 2022

PACHULSKI STANG ZIEHL & JONES
LLP

By /s/ Jeffrey N. Pomerantz

Jeffrey N. Pomerantz

Counsel to the Official Committee of
Unsecured Creditors

EXHIBIT “1”

**Summary of Hours by Professional for Application Period
(November 1, 2022 – November 30, 2022)**

Name of Professional	Title	Hours	Rate	Total Billed
Pomerantz, Jeffrey N.	Partner	14.40	\$900.00	\$12,960.00
Grassgreen, Debra I.	Partner	1.70	\$900.00	\$1,530.00
Kapur, Teddy M.	Partner	0.80	\$900.00	\$720.00
Brown, Gillian N.	Of Counsel	0.10	\$900.00	\$90.00
Golden, Steven W.	Associate	42.50	\$900.00	\$38,250.00
Forrester, Leslie A.	Law Librarian	3.80	\$495.00	\$1,881.00
Dassa, Beth D.	Paralegal	15.90	\$495.00	\$7,870.50
TOTAL		79.20		\$63,301.50

EXHIBIT “2”

**Detailed Time and Expense Statement for Application Period
(November 1, 2022 – November 30, 2022)**

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

November 30, 2022

Invoice 131451

Client 10283

Matter 00002

JNP

JNP

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2022

FEES \$63,301.50

EXPENSES \$557.32

TOTAL CURRENT CHARGES **\$63,858.82**

BALANCE FORWARD **\$97,293.08**

TOTAL BALANCE DUE **\$161,151.90**

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	495.00	15.90	\$7,870.50
DG	Grassgreen, Debra I.	Partner	900.00	1.70	\$1,530.00
GNB	Brown, Gillian N.	Counsel	900.00	0.10	\$90.00
JNP	Pomerantz, Jeffrey N.	Partner	900.00	14.40	\$12,960.00
LAF	Forrester, Leslie A.	Other	495.00	3.80	\$1,881.00
SWG	Golden, Steven W.	Associate	900.00	42.50	\$38,250.00
TMK	Kapur, Teddy M.	Partner	900.00	0.80	\$720.00
				<hr/> 79.20	<hr/> \$63,301.50

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	8.30	\$7,105.50
BL	Bankruptcy Litigation [L430]	9.90	\$7,897.50
CA	Case Administration [B110]	7.50	\$5,535.00
CO	Claims Admin/Objections[B310]	3.30	\$2,605.50
CP	Compensation Prof. [B160]	14.30	\$12,424.50
EB	Employee Benefit/Pension-B220	3.50	\$3,150.00
FF	Financial Filings [B110]	0.30	\$270.00
GC	General Creditors Comm. [B150]	17.90	\$15,259.50
MC	Meeting of Creditors [B150]	0.40	\$360.00
OP	Operations [B210]	0.50	\$450.00
RP	Retention of Prof. [B160]	13.30	\$8,244.00
		79.20	<hr/> \$63,301.50

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Bloomberg	\$40.00
Lexis/Nexis- Legal Research [E	\$459.22
Pacer - Court Research	\$50.40
Reproduction/ Scan Copy	\$7.70
	<hr/>
	\$557.32

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Disposition [B130]						
11/11/2022	SWG	AD	Draft and send email to Committee re: bid procedures	0.20	900.00	\$180.00
11/11/2022	SWG	AD	Review filed bid procedures and propose edits to same	0.40	900.00	\$360.00
11/11/2022	SWG	AD	Draft and send email to J. Pomerantz and FTI teams re: comments to bid procedures.	0.20	900.00	\$180.00
11/11/2022	SWG	AD	Review and edit proposed assumption and assignment procedures.	0.40	900.00	\$360.00
11/12/2022	SWG	AD	Call with N. Ganti re: sale process	0.70	900.00	\$630.00
11/14/2022	SWG	AD	Respond to J. Pomerantz email re: bid procedures	0.10	900.00	\$90.00
11/14/2022	SWG	AD	Draft and send email to Debtor's counsel re: bid/contract procedures.	0.20	900.00	\$180.00
11/17/2022	JNP	AD	Review state opposition to sale procedures motion and email with Steven W. Golden regarding same.	0.20	900.00	\$180.00
11/17/2022	BDD	AD	Email S. Golden re DHCS opposition to Debtor's Motion for approval of APA, and declarations re same	0.10	495.00	\$49.50
11/21/2022	TMK	AD	Confer with CEO of potential bidder about possible sale and coordinate introduction to PSZJ and FTI teams.	0.80	900.00	\$720.00
11/22/2022	BDD	AD	Prepare draft joinder to Debtor's omni reply to oppos to bid procedures motion	0.50	495.00	\$247.50
11/23/2022	BDD	AD	Email S. Golden re Omnibus Reply to Objections to Bid Procedures Motion	0.10	495.00	\$49.50
11/26/2022	JNP	AD	Conference with M. Bilbao regarding sale process and related issues.	0.30	900.00	\$270.00
11/26/2022	SWG	AD	Call with T. Moyron re: bid pro motion and related pending matters	0.30	900.00	\$270.00
11/26/2022	SWG	AD	Review and summarize bid procedures objections	0.70	900.00	\$630.00
11/28/2022	SWG	AD	Call with Committee member re: sale process.	1.00	900.00	\$900.00
11/30/2022	BDD	AD	Email S. Golden re pleadings on Bid Pro Motion hearing and Motion to Enlarge Time to File POC, filed by Inland Valley Investments	0.20	495.00	\$99.00
11/30/2022	SWG	AD	Draft reply and joinder re: Bidding Procedures	1.70	900.00	\$1,530.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Motion			
11/30/2022	SWG	AD	Review and comment on proposed sale notices and declaration in support of Bid Procedures Motion	0.20	900.00	\$180.00
				8.30		\$7,105.50

Bankruptcy Litigation [L430]

11/01/2022	GNB	BL	Email with Beth D. Dassa regarding discovery; Telephone conference with Beth D. Dassa regarding same.	0.10	900.00	\$90.00
11/01/2022	BDD	BL	Research 2004 motions and emails L. Forrester re same (.50); confer with G. Brown re procedures for 2004 motions vs subpoenas (with initial disclosures) for adversary matters (.10); email S. Golden re 2004 motion (.10); prepare 2004 motion per S. Golden request and email re same (1.7)	2.40	495.00	\$1,188.00
11/04/2022	SWG	BL	Review and comment on stipulation re: mediation	0.20	900.00	\$180.00
11/07/2022	JNP	BL	Review and respond to emails regarding identity of mediators.	0.30	900.00	\$270.00
11/07/2022	JNP	BL	Emails regarding identity of potential mediator.	0.10	900.00	\$90.00
11/08/2022	SWG	BL	Draft and send email update to Committee re: mediation	0.20	900.00	\$180.00
11/14/2022	DG	BL	Review background documents in preparation for call with Judge Montali (.7); emails with S. Golden re: same (.1)	0.80	900.00	\$720.00
11/14/2022	JNP	BL	Conference with Steven W. Golden regarding mediation.	0.10	900.00	\$90.00
11/15/2022	DG	BL	Call with Judge Montali and other mediation parties (.7); confer with S. Golden re: same (.2)	0.90	900.00	\$810.00
11/15/2022	JNP	BL	Conference with Steven W. Golden regarding call with Judge Montali regarding mediation.	0.20	900.00	\$180.00
11/15/2022	SWG	BL	Participate in preliminary call re: mediation	0.70	900.00	\$630.00
11/16/2022	SWG	BL	Draft email to Judge Montali re: mediation	0.20	900.00	\$180.00
11/28/2022	JNP	BL	Emails to and from D. Montali regarding mediation.	0.20	900.00	\$180.00
11/29/2022	JNP	BL	Conference with Steven W. Golden in advance of mediation call with Judge Montali.	0.30	900.00	\$270.00
11/29/2022	JNP	BL	Participate in mediation call with Steven W. Golden	1.00	900.00	\$900.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			and Judge Montali			
11/29/2022	JNP	BL	Conference with Steven W. Golden after call with J Montali.	0.10	900.00	\$90.00
11/29/2022	BDD	BL	Email S. Golden re Settlement Conference Order (BCHF v. Calif Dept of Healthcare Services adv case)	0.10	495.00	\$49.50
11/29/2022	SWG	BL	Draft email to J. Pomerantz re: discussion with Judge Montali on mediation	0.30	900.00	\$270.00
11/29/2022	SWG	BL	Call with Judge Montali re: mediation (1.0); follow up with J. Pomerantz re same (.1)	1.10	900.00	\$990.00
11/29/2022	SWG	BL	Call with T. Moyron re: mediation	0.60	900.00	\$540.00
				9.90		\$7,897.50

Case Administration [B110]

11/03/2022	BDD	CA	Attend to calendaring matters with B. Anavim and M. Kulick	0.20	495.00	\$99.00
11/03/2022	SWG	CA	Call with FTI strategic communications team re: Committee strategic matters	0.80	900.00	\$720.00
11/04/2022	BDD	CA	Email N. Brown re S. Golden pro hac vice	0.10	495.00	\$49.50
11/11/2022	SWG	CA	Participate in weekly call with Debtor's counsel	0.60	900.00	\$540.00
11/16/2022	SWG	CA	Call with T. Moyron re: status of case.	0.40	900.00	\$360.00
11/17/2022	BDD	CA	Review docket re critical dates and update critical dates memo re same (.50); attend to calendaring matters (.10); email PSZJ team re same (.10)	0.70	495.00	\$346.50
11/18/2022	JNP	CA	Conference with Samuel R. Maizel, T. Moyron and Steven W. Golden regarding case status.	0.40	900.00	\$360.00
11/18/2022	JNP	CA	Conference with FTI and Steven W. Golden regarding case status.	0.60	900.00	\$540.00
11/18/2022	SWG	CA	Weekly call with Debtor's counsel.	0.40	900.00	\$360.00
11/18/2022	SWG	CA	Conference with J. Pomerantz regarding case status	0.10	900.00	\$90.00
11/22/2022	BDD	CA	Review docket and update critical dates memo re same (.60); email S. Golden re same (.10)	0.70	495.00	\$346.50
11/22/2022	BDD	CA	Attend to calendaring matters with B. Anavim	0.10	495.00	\$49.50
11/26/2022	JNP	CA	Sale and operational update call with FTI and Steven W. Golden.	1.00	900.00	\$900.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/28/2022	BDD	CA	Attend to calendaring matters with M. Kulick	0.10	495.00	\$49.50
11/29/2022	BDD	CA	Review docket and update critical dates memo re same (.60); email S. Golden re same (.10)	0.70	495.00	\$346.50
11/29/2022	SWG	CA	Draft and send email to Debtor's counsel re: follow up on administration matters	0.20	900.00	\$180.00
11/30/2022	BDD	CA	Email J. Pomerantz re binders for 12/7 hearings	0.10	495.00	\$49.50
11/30/2022	BDD	CA	Email N. Brown re 12/7 hearings	0.10	495.00	\$49.50
11/30/2022	BDD	CA	Email J. Pomerantz and S. Golden re Zoom links for 12/6 and 12/7 hearings	0.10	495.00	\$49.50
11/30/2022	BDD	CA	Review index of pleadings for 12/7 hearings and email N. Brown re same	0.10	495.00	\$49.50
				7.50		\$5,535.00

Claims Admin/Objections[B310]

11/16/2022	JNP	CO	Review motion to extend time to file claim; Conference with Steven W. Golden regarding same.	0.20	900.00	\$180.00
11/16/2022	BDD	CO	Email J. Pomerantz and S. Golden re Emergency App for Order Enlarging Time to File POC, filed by Inland Valley Investments LLC, et al.	0.10	495.00	\$49.50
11/21/2022	JNP	CO	Review McKesson claim stipulation.	0.10	900.00	\$90.00
11/21/2022	BDD	CO	Prepare joinder to Debtor's opp to Motion to Extend Bar Date and email S. Golden re same	0.40	495.00	\$198.00
11/21/2022	SWG	CO	Research re: Priest entities motion to extend bar date and comment on Debtor's opposition to same.	1.20	900.00	\$1,080.00
11/22/2022	SWG	CO	Draft joinder to Debtor's objection to motion to extend bar date.	0.90	900.00	\$810.00
11/29/2022	BDD	CO	Revisions to Joinder of C'tee in Support of Debtor's Opp to Application for Order Enlarging Time to File POC, filed by Inland Valley Investments, LLC, et al., and emails S. Golden and N. Brown re same	0.20	495.00	\$99.00
11/29/2022	BDD	CO	Email S. Golden re 12/6 hearing on Motion Enlarging Time to File Proof of Claim, filed by Inland Valley Investment, LLC, et al.	0.10	495.00	\$49.50
11/29/2022	BDD	CO	Email KCC re service of C'tee's Joinder in Support of Debtor's Opp to Motion Enlarging Time to File Proof of Claim, filed by Inland Valley Investment,	0.10	495.00	\$49.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LLC, et al.				3.30		\$2,605.50
Compensation Prof. [B160]						
11/04/2022	SWG	CP	Receive and review proposed interim compensation procedures motion.	0.20	900.00	\$180.00
11/17/2022	BDD	CP	Email S. Golden re hearing on Debtor's motion to establish monthly fee procedures (.10); call to court clerk re Zoom appearance for 11/21 hearing (.10)	0.20	495.00	\$99.00
11/18/2022	JNP	CP	Review McKesson opposition to fee procedures motion.	0.10	900.00	\$90.00
11/21/2022	SWG	CP	Call with J. Pomerantz re: hearing on Knudsen motion	0.30	900.00	\$270.00
11/21/2022	SWG	CP	Call with Debtor's counsel re: professional compensation matters.	0.30	900.00	\$270.00
11/22/2022	BDD	CP	Prepare draft joinder to Debtor's reply to McKesson opp to interim comp motion	0.30	495.00	\$148.50
11/22/2022	SWG	CP	Call with C. Nelson re: Knudsen motion	0.30	900.00	\$270.00
11/23/2022	JNP	CP	Review McKesson supplemental objection to Knudsen motion.	0.20	900.00	\$180.00
11/23/2022	JNP	CP	Conference with Steven W. Golden regarding supplemental objection to Knudsen motion.	0.30	900.00	\$270.00
11/23/2022	BDD	CP	Email S. Golden re Reply to McKesson objection to professional compensation procedures motion	0.10	495.00	\$49.50
11/23/2022	SWG	CP	Research re: Knudsen motion	0.60	900.00	\$540.00
11/26/2022	SWG	CP	Draft reply to McKesson objection to Knudsen motion	4.50	900.00	\$4,050.00
11/28/2022	SWG	CP	Continue drafting reply to McKesson objection to Knudsen motion	4.70	900.00	\$4,230.00
11/29/2022	JNP	CP	Review and revise reply regarding Knudsen motion.	0.50	900.00	\$450.00
11/29/2022	BDD	CP	Work on hearing binders for 12/7 hearing and emails N. Brown re same	0.50	495.00	\$247.50
11/30/2022	JNP	CP	Review revised reply regarding McKesson objection to Knudsen motion	0.20	900.00	\$180.00
11/30/2022	SWG	CP	Edit reply to McKesson objection to Knudsen motion	1.00	900.00	\$900.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
				14.30		\$12,424.50
Employee Benefit/Pension-B220						
11/01/2022	JNP	EB	Review emails regarding KERP and KEIP.	0.10	900.00	\$90.00
11/01/2022	SWG	EB	Review KEIP and KERP materials sent by Debtor.	0.30	900.00	\$270.00
11/02/2022	JNP	EB	Conference with Steven W. Golden and FTI regarding KEIP and KERP.	0.30	900.00	\$270.00
11/02/2022	JNP	EB	Conference with Steven W. Golden regarding call with Debtor regarding KEIP and KERP.	0.30	900.00	\$270.00
11/02/2022	JNP	EB	Review email regarding notice of increase of insider compensation.	0.10	900.00	\$90.00
11/02/2022	SWG	EB	Call with FTI team re: KEIP/KERP	0.30	900.00	\$270.00
11/02/2022	SWG	EB	Call with Debtors re: KEIP and KERP	1.00	900.00	\$900.00
11/02/2022	SWG	EB	Call with J. Pomerantz re: KEIP/KERP	0.30	900.00	\$270.00
11/03/2022	SWG	EB	Review and edit KEIP and KERP	0.40	900.00	\$360.00
11/07/2022	SWG	EB	Discuss KEIP/KERP with N. Ganti	0.20	900.00	\$180.00
11/16/2022	SWG	EB	Draft and send email to Committee re: KEIP/KERP Motion	0.20	900.00	\$180.00
				3.50		\$3,150.00
Financial Filings [B110]						
11/08/2022	SWG	FF	Review and respond to answers from Debtor re: schedules and SOFAs.	0.30	900.00	\$270.00
				0.30		\$270.00
General Creditors Comm. [B150]						
11/01/2022	JNP	GC	Conference with Committee in preparation for call with Debtor.	0.50	900.00	\$450.00
11/01/2022	JNP	GC	Conference with Committee, debtor and debtor professionals.	1.00	900.00	\$900.00
11/01/2022	JNP	GC	Conference with Steven W. Golden after Committee call.	0.30	900.00	\$270.00
11/01/2022	SWG	GC	Call with committee member re: case strategy	0.30	900.00	\$270.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/01/2022	SWG	GC	Participate in weekly Committee call	0.50	900.00	\$450.00
11/01/2022	SWG	GC	Participate in call with Debtor and Committee.	1.00	900.00	\$900.00
11/01/2022	SWG	GC	Receive and respond to email from FTI re: media strategy	0.10	900.00	\$90.00
11/01/2022	SWG	GC	Call with J. Pomerantz re: case strategy matters	0.30	900.00	\$270.00
11/02/2022	BDD	GC	Email PSZJ team re Notice of Appointment of Unsecured Creditors' Committee	0.10	495.00	\$49.50
11/04/2022	SWG	GC	Participate in call with Debtors' counsel	0.50	900.00	\$450.00
11/04/2022	SWG	GC	Call with FTI re: discussion with Debtor's counsel	0.20	900.00	\$180.00
11/07/2022	JNP	GC	Participate on Committee call.	1.00	900.00	\$900.00
11/07/2022	JNP	GC	Call with S. Golden after Committee meeting	0.10	900.00	\$90.00
11/07/2022	SWG	GC	Participate in weekly Committee call (1.0); call with J. Pomerantz after same (0.1).	1.10	900.00	\$990.00
11/11/2022	SWG	GC	Call with Committee member re: case matters.	0.60	900.00	\$540.00
11/14/2022	JNP	GC	Participate on Committee call.	0.80	900.00	\$720.00
11/14/2022	SWG	GC	Draft and send Committee call agenda	0.10	900.00	\$90.00
11/14/2022	SWG	GC	Participate in weekly Committee call	0.80	900.00	\$720.00
11/16/2022	SWG	GC	Call with C. Nelson re: case status	0.20	900.00	\$180.00
11/17/2022	LAF	GC	Update creditor website.	0.50	495.00	\$247.50
11/17/2022	BDD	GC	Emails S. Golden and L. Forrester re updates to creditor website	0.20	495.00	\$99.00
11/17/2022	BDD	GC	Work on revised order re committee information motion and emails S. Golden and N. Brown re same	0.50	495.00	\$247.50
11/18/2022	BDD	GC	Email S. Golden re order on Committee Information Motion	0.10	495.00	\$49.50
11/18/2022	SWG	GC	Call with PSZJ and FTI teams re: case status and catch up	0.50	900.00	\$450.00
11/18/2022	SWG	GC	Call with Committee member re: recent filings and case status	0.50	900.00	\$450.00
11/21/2022	JNP	GC	Review emails and send email to committee regarding status.	0.10	900.00	\$90.00
11/21/2022	BDD	GC	Email KCC re service of order on Committee	0.10	495.00	\$49.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Information Motion			
11/21/2022	SWG	GC	Draft comprehensive email update to Committee	0.40	900.00	\$360.00
11/21/2022	SWG	GC	Calls (.9; .4) with Committee member re: case status and strategy	1.30	900.00	\$1,170.00
11/22/2022	JNP	GC	Emails to and from J. Garfinkle regarding McKesson deposit and issues regarding same.	0.30	900.00	\$270.00
11/22/2022	JNP	GC	Conference with Steven W. Golden regarding McKesson and related issues.	0.20	900.00	\$180.00
11/22/2022	BDD	GC	Email L. Forrester re entered order on Committee information motion	0.10	495.00	\$49.50
11/26/2022	SWG	GC	Catch up call with PSZJ and FTI re: case status	1.00	900.00	\$900.00
11/28/2022	JNP	GC	Participate in Committee call.	1.40	900.00	\$1,260.00
11/28/2022	LAF	GC	Update Borrego creditor site.	0.50	495.00	\$247.50
11/30/2022	SWG	GC	Call with Committee member re: case status and strategy	0.70	900.00	\$630.00
				17.90		\$15,259.50

Meeting of Creditors [B150]

11/08/2022	SWG	MC	Participate in continued 341 meeting.	0.40	900.00	\$360.00
				0.40		\$360.00

Operations [B210]

11/13/2022	JNP	OP	Review PCO report.	0.20	900.00	\$180.00
11/14/2022	SWG	OP	Draft and send email to FTI re: PCO Report.	0.30	900.00	\$270.00
				0.50		\$450.00

Retention of Prof. [B160]

11/01/2022	JNP	RP	Review McKesson objection to retention.	0.10	900.00	\$90.00
11/01/2022	BDD	RP	Review McKesson limited objection to PSZJ retention application and email PSZJ team re same	0.10	495.00	\$49.50
11/02/2022	JNP	RP	Conference with Steven W. Golden regarding retention application objection.	0.20	900.00	\$180.00
11/02/2022	JNP	RP	Emails regarding hearing date for retention application.	0.10	900.00	\$90.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/02/2022	LAF	RP	Legal research re: Regional rates in SD Cal.	2.80	495.00	\$1,386.00
11/02/2022	BDD	RP	Work on issues re setting up hearing on PSZJ retention application per McKesson opp filed, including multiple calls with/emails to court clerk and S. Golden (.60); email J. Pomerantz re same (.10)	0.70	495.00	\$346.50
11/02/2022	BDD	RP	Work on reply to McKesson limited opp to PSZJ retention application and email S. Golden re same	0.60	495.00	\$297.00
11/02/2022	BDD	RP	Email B. Downing re McKesson limited objection to PSZJ retention application	0.10	495.00	\$49.50
11/02/2022	BDD	RP	Email J. Pomerantz and S. Golden re UST Statement of Position re PSZJ retention application	0.10	495.00	\$49.50
11/02/2022	SWG	RP	Call with J. Pomerantz re: PSZJ retention application	0.20	900.00	\$180.00
11/03/2022	JNP	RP	Emails regarding scheduling hearing for retention application.	0.10	900.00	\$90.00
11/03/2022	BDD	RP	Prepare Notice of Hearing on PSZJ retention application and email S. Golden, N. Brown and KCC re same	0.50	495.00	\$247.50
11/03/2022	BDD	RP	Email J. Pomerantz, T. Kapur and S. Golden re filed notice of hearing on PSZJ's retention application	0.10	495.00	\$49.50
11/03/2022	BDD	RP	Calls with BK clerk (R. Paluso) and multiple emails J. Pomerantz and S. Golden re hearing on PSZJ retention application	0.30	495.00	\$148.50
11/03/2022	SWG	RP	Research and draft reply to objection to PSZJ retention application.	1.80	900.00	\$1,620.00
11/04/2022	SWG	RP	Continue drafting response to objection to PSZJ retention application	0.60	900.00	\$540.00
11/06/2022	JNP	RP	Review and comment on reply regarding retention application.	0.20	900.00	\$180.00
11/06/2022	BDD	RP	Email S. Golden re reply to McKesson objection to PSZJ retention application	0.10	495.00	\$49.50
11/06/2022	SWG	RP	Edit reply to objection to PSZJ retention application	0.20	900.00	\$180.00
11/07/2022	JNP	RP	Review latest version regarding retention application reply.	0.10	900.00	\$90.00
11/07/2022	BDD	RP	Email J. Pomerantz re reply to McKesson objection to PSZJ retention application	0.10	495.00	\$49.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/08/2022	BDD	RP	Emails S. Golden and N. Brown re reply to McKesson objection to PSZJ retention application	0.30	495.00	\$148.50
11/08/2022	BDD	RP	Email KCC re service of reply to McKesson's objection to PSZJ retention application	0.10	495.00	\$49.50
11/10/2022	BDD	RP	Email S. Golden re Statement of Position filed by UST re FTI retention application	0.10	495.00	\$49.50
11/14/2022	BDD	RP	Email PSZJ team re Statement of Position re Denton's retention application	0.10	495.00	\$49.50
11/14/2022	BDD	RP	Email N. Brown re UST Statement of Position re Denton's retention application	0.10	495.00	\$49.50
11/15/2022	BDD	RP	Email G. Downing re UST Statement of Position re no opp to Debtor's application to retain Ankura to provide CRO	0.10	495.00	\$49.50
11/15/2022	BDD	RP	Email J. Pomerantz, T. Kapur and S. Golden re UST Statement of Position re Debtor's App to Employ Ankura to provide CRO	0.10	495.00	\$49.50
11/16/2022	BDD	RP	Email S. Golden re supplemental dec/order re PSZJ retention application	0.10	495.00	\$49.50
11/17/2022	BDD	RP	Prepare supplemental declaration re FTI retention application and emails S. Golden re same (.60); prepare proposed Order re FTI retention application (.50); emails S. Golden re same (.10)	1.20	495.00	\$594.00
11/18/2022	BDD	RP	Emails S. Golden and N. Brown re supplemental declaration in support of FTI retention application	0.30	495.00	\$148.50
11/18/2022	BDD	RP	Email KCC team re service of supplemental declaration of C. Nelson in support of FTI retention application	0.10	495.00	\$49.50
11/21/2022	JNP	RP	Conference with Steven W. Golden regarding various retention and related issues.	0.30	900.00	\$270.00
11/23/2022	BDD	RP	Email S. Golden re Order on FTI employment application	0.10	495.00	\$49.50
11/28/2022	JNP	RP	Emails to and from court clerk and Steven W. Golden regarding zoom appearance at retention hearing.	0.20	900.00	\$180.00
11/28/2022	BDD	RP	Emails N. Brown re hearing binder for 12/7 hearing on C'tee retention application	0.10	495.00	\$49.50
11/28/2022	BDD	RP	Calls with R. Paluso (court clerk) re hearing on PSZJ retention application and emails J. Pomerantz	0.30	495.00	\$148.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			and S. Golden re same			
11/28/2022	BDD	RP	Prepare Amended Notice of Hearing on PSZJ's retention application (.20) and email S. Golden re same (.10)	0.30	495.00	\$148.50
11/29/2022	BDD	RP	Email S. Golden re FTI retention order	0.10	495.00	\$49.50
11/30/2022	BDD	RP	Email S. Golden re case law in support of PSZJ retention	0.10	495.00	\$49.50
11/30/2022	BDD	RP	Email S. Golden re order entered on FTI retention	0.10	495.00	\$49.50
				13.30		\$8,244.00
TOTAL SERVICES FOR THIS MATTER:						\$63,301.50

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Expenses

11/01/2022	LN	10283.00002 Lexis Charges for 11-01-22	6.98
11/01/2022	LN	10283.00002 Lexis Charges for 11-01-22	20.07
11/02/2022	BB	10283.00002 Bloomberg Charges through 11-02-22	40.00
11/02/2022	LN	10283.00002 Lexis Charges for 11-02-22	58.56
11/03/2022	LN	10283.00002 Lexis Charges for 11-03-22	6.98
11/03/2022	LN	10283.00002 Lexis Charges for 11-03-22	11.22
11/04/2022	LN	10283.00002 Lexis Charges for 11-04-22	6.98
11/21/2022	LN	10283.00002 Lexis Charges for 11-21-22	55.76
11/21/2022	LN	10283.00002 Lexis Charges for 11-21-22	11.22
11/21/2022	LN	10283.00002 Lexis Charges for 11-21-22	6.69
11/22/2022	LN	10283.00002 Lexis Charges for 11-22-22	6.98
11/22/2022	LN	10283.00002 Lexis Charges for 11-22-22	7.48
11/22/2022	LN	10283.00002 Lexis Charges for 11-22-22	20.07
11/22/2022	LN	10283.00002 Lexis Charges for 11-22-22	11.20
11/23/2022	LN	10283.00002 Lexis Charges for 11-23-22	27.88
11/23/2022	LN	10283.00002 Lexis Charges for 11-23-22	11.21
11/23/2022	LN	10283.00002 Lexis Charges for 11-23-22	40.15
11/23/2022	LN	10283.00002 Lexis Charges for 11-23-22	11.22
11/26/2022	LN	10283.00002 Lexis Charges for 11-26-22	76.64
11/26/2022	LN	10283.00002 Lexis Charges for 11-26-22	13.39
11/28/2022	LN	10283.00002 Lexis Charges for 11-28-22	7.05
11/28/2022	LN	10283.00002 Lexis Charges for 11-28-22	3.74
11/28/2022	LN	10283.00002 Lexis Charges for 11-28-22	6.69
11/28/2022	LN	10283.00002 Lexis Charges for 11-28-22	3.74
11/28/2022	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
11/28/2022	RE2	SCAN/COPY (7 @0.10 PER PG)	0.70
11/28/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
11/28/2022	RE2	SCAN/COPY (33 @0.10 PER PG)	3.30
11/28/2022	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
11/28/2022	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
11/28/2022	RE2	SCAN/COPY (9 @0.10 PER PG)	0.90
11/30/2022	LN	10283.00002 Lexis Charges for 11-30-22	13.94

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11/30/2022	LN	10283.00002 Lexis Charges for 11-30-22	13.38
11/30/2022	PAC	Pacer - Court Research	50.40
11/30/2022	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
11/30/2022	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20

Total Expenses for this Matter

\$557.32

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 11/30/2022

Total Fees \$63,301.50

Total Expenses 557.32

Total Due on Current Invoice \$63,858.82

Outstanding Balance from prior invoices as of 11/30/2022 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
131394	10/31/2022	\$94,549.50	\$2,743.58	\$97,293.08

Total Amount Due on Current and Prior Invoices: \$161,151.90